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19 *Attorneys for Defendants*
20 UBER TECHNOLOGIES, INC., RASIER, LLC,
21 And RASIER-CA, LLC

22 **UNITED STATES DISTRICT COURT**

23 **NORTHERN DISTRICT OF CALIFORNIA**

24 **SAN FRANCISCO DIVISION**

25 IN RE: UBER TECHNOLOGIES, INC.,
26 PASSENGER SEXUAL ASSAULT
27 LITIGATION

28 This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
No. 23-cv-06708

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN
HORN IN SUPPORT OF DEFENDANTS
UBER TECHNOLOGIES, INC., RASIER,
LLC, AND RASIER-CA, LLC'S OMNIBUS
MOTIONS IN LIMINE**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

29 DECLARATION OF LAURA VARTAIN HORN ISO DEFENDANTS' OMNIBUS MOTIONS IN
30 LIMINE

31 Case No. 3:23-md-03084-CRB (LJC)

1 I, Laura Vartain Horn, declare as follows:

2 1. I am an attorney at law duly admitted to practice before the courts of the State of California
3 and a partner with the law firm of Kirkland & Ellis LLP, counsel of record for Defendants Uber
4 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, "Uber") in this action. I have personal
5 knowledge of each and all of the facts stated in this declaration and, if called as a witness, could and would
6 competently testify to the facts contained herein.

7 2. Attached as **Exhibit 1** is a true and correct copy of the JCCP Order re Parties' Motions in
8 Limine and Motions to Exclude Expert Opinions, dated August 29, 2025.

9 3. Attached as **Exhibit 2** is a true and correct copy of an article entitled "Uber shares personal
10 rider information in sexual assault cases with a claims company without informing alleged victims," dated
11 October 4, 2019.

12 4. Attached as **Exhibit 3** is a true and correct copy of excerpts of the Deposition Transcript
13 of Kayla Whaling, dated February 28, 2025.

14 5. Attached as **Exhibit 4** is a true and correct copy of excerpts of the Deposition Transcript
15 of Brooke Anderson, dated May 6, 2025.

16 6. Attached as **Exhibit 5** is a true and correct copy of excerpts of the Deposition Transcript
17 of Andrew Hasbun, dated April 10, 2025.

18 7. Attached as **Exhibit 6** is a true and correct copy of excerpts of the Deposition Transcript
19 of Valerie Shuping, dated April 17, 2025.

20 8. Attached as **Exhibit 7** is a true and correct copy of excerpts of the Deposition Transcript
21 of Hannah Nilles, dated June 30, 2025.

22 9. Attached as **Exhibit 8** is a true and correct copy of excerpts of the Deposition Transcript
23 of Jordan Burke, dated March 20, 2025.

24 10. Attached as **Exhibit 9** is a true and correct copy of the JCCP Order re Motion for Summary
25 Judgment or, in the Alternative, Summary Adjudication, dated July 31, 2025.

26 11. Attached as **Exhibit 10** is a true and correct copy of excerpts of the Deposition Transcript
27 of David Curtis Sawyer, dated October 23, 2025.

1 12. Attached as **Exhibit 11** is a true and correct copy of excerpts of the Deposition Transcript
2 of Hassan Turay, dated July 23, 2025.

3 13. Attached as **Exhibit 12** is a true and correct copy of the bates stamped document UBER-
4 MDL3084-BW-00012056.

5 14. Attached as **Exhibit 13** is a true and correct copy of the bates stamped document
6 CHECKR000891 through 000893.

7 15. Attached as **Exhibit 14** is a true and correct copy of the bates stamped document
8 CHECKR000894.

9 16. Attached as **Exhibit 15** is a true and correct copy of the bates stamped document
10 CHECKR000742 through 000745.

11 17. Attached as **Exhibit 16** is a true and correct copy of excerpts of the Deposition Transcript
12 of Hannah Nilles, dated August 7, 2025.

13 18. Attached as **Exhibit 17** is a true and correct copy of the bates stamped document UBER-
14 MDL-3084-DFS00003702 through 00003703.

15 19. Attached as **Exhibit 18** is a true and correct copy of the bates stamped document UBER-
16 MDL-3084-DFS00003687.

17 20. Attached as **Exhibit 19** is a true and correct copy of the bates stamped document UBER-
18 MDL-3084-DFS00003705 through 00003706.

19 21. Attached as **Exhibit 20** is a true and correct copy of the bates stamped document UBER-
20 MDL-3084-DFS00159669 through 00159671.

21 22. Attached as **Exhibit 21** is a true and correct copy of the bates stamped document UBER-
22 MDL-3084-DFS00003707.

23 23. Attached as **Exhibit 22** is a true and correct copy of the bates stamped document UBER-
24 MDL-3084-DFS00003690 through 00003691.

25 24. Attached as **Exhibit 23** is a true and correct copy of the bates stamped document UBER-
26 MDL-3084-DFS00003711 through 00003716.

1 25. Attached as **Exhibit 24** is a true and correct copy of the bates stamped document UBER-
2 MDL-3084-DFS00216657.

3 26. Attached as **Exhibit 25** is a true and correct copy of excerpts of the Deposition Transcript
4 of Greg Brown, dated August 26, 2025.

5 27. Attached as **Exhibit 26** is a true and correct copy of the bates stamped document UBER-
6 MDL-3084-DFS00159699 through 00159700.

7 I declare under penalty of perjury under the laws of the United States and the State of California
8 that the foregoing is true and correct.

9 Executed on December 16, 2025, in San Francisco, California.

10 _____
11 */s/ Laura Vartain Horn* _____

12 Laura Vartain Horn
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